

**BEFORE THE  
ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI**

\_\_\_\_\_, Petitioner

vs.

case no. \_\_\_\_\_

\_\_\_\_\_, Respondent

**Joint Proposal for Entry of Pre-Hearing Order**

The parties provide the following information and suggested deadlines for purposes of preparing for hearing, and ask the Commission to adopt a pre-hearing order as follows:

1. Statement of the Case
  - A. Nature of the case [List of the claims and the relief sought]:
  - B. Jurisdiction [List of statutory basis for jurisdiction, and description of any disputes about jurisdiction]:
2. Stipulations
  - A. Undisputed facts [List of facts about which the parties agree]:
  - B. Agreed-to issues of law [List of any legal issues that the parties agree should be decided by this Commission]:
3. Discovery  
[Statement of whether the parties wish to engage in discovery. If they do, the types of discovery the parties expect to perform is listed. The deadline for the parties' disclosures, to each other, of their expert and fact witnesses, and the deadline for the completion of all discovery, are also listed.]
4. Witness List  
[The parties' suggested deadline to file a list of the witnesses whom they expect to call at hearing, including experts, should be listed. Rebuttal witnesses need not be listed, unless the parties wish to propose otherwise.]

5. Exhibits

The Petitioner's exhibits shall be marked in numerical order, and the Respondent's in alphabetical order. Joint exhibits shall be marked in such fashion as the parties agree.

[The parties' suggested deadline to file a pre-hearing exhibit list should be listed.]

6. Hearing

[If a hearing has not yet been set, or if a scheduled hearing date is set but the parties propose that it should be changed, the parties should propose a new hearing date or dates, and indicate how many days they anticipate the hearing will take. The parties should also identify any special issues related to the hearing, such as location, or the need for testimony to be taken by telephone.]

7. Summary Decision

[The parties should propose a deadline to file motions for summary decision.]

8. Modifications

The parties acknowledge that if either wishes to later modify the proposals contained herein, or to modify any scheduling order established by this Commission pursuant to their joint proposal, that they will seek to do so in cooperation with each other, if possible.

Date: \_\_\_\_\_

Respectfully submitted,

\_\_\_\_\_  
[PETITIONER]  
[CONTACT INFORMATION]

\_\_\_\_\_  
[RESPONDENT]  
[CONTACT INFORMATION]